



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2

290 BROADWAY

NEW YORK, NY 10007-1866

DEC 08 2015

**CERTIFIED MAIL – RETURN RECEIPT REQUESTED**

**Article Number: 7015 0640 0001 0675 7504**

Adam Weitsman, Owner  
Weitsman Recycling, LLC  
P.O. Box 420  
Owego, NY 13827

**Re: Weitsman Shredding, LLC d/b/a Upstate Shredding, LLC  
Compliance Evaluation Inspection – August 4, 2015  
SPDES Tracking No. NYR00D022**

Dear Mr. Weitsman:

This letter is in reference to the National/State Pollutant Discharge Elimination System (NPDES/SPDES) Compliance Evaluation Inspection (CEI) conducted by the United States Environmental Protection Agency (EPA) Region 2, Water Compliance Branch, on August 4, 2015. The enclosed report identifies certain Areas of Concern, which are items that should be addressed to improve stormwater management and operation of the facility, and Potential Noncompliance Items, which must be remedied immediately, if they have not already, pursuant to the Clean Water Act and the New York State Department of Environmental Conservation (NYSDEC) regulations.

Within **forty-five (45) calendar days** of receipt of this letter, please respond to the EPA in writing with the actions that the facility has taken or will take to address the Potential Noncompliance Items and Areas of Concern identified in this report. Several of these items were already remedied by you during or shortly after the CEI. For such items, please confirm that the practices implemented continue to be effective and/or provide any relevant updates, as appropriate. Also, please send a copy of your response to the NYSDEC (Joe DiMura, P.E., Director, Bureau of Water Compliance, NYSDEC, 625 Broadway, Albany, NY 12233).

If you have any questions regarding this letter or the inspection report, please contact me at (212) 637-4268 or Ms. Katherine Mann of my staff at (212) 637-4226.

For further information on EPA's Stormwater Program such as Best Management Practices and Stormwater Controls, see EPA's website at <http://www2.epa.gov/national-pollutant-discharge-elimination-system-npdes> and NYSDEC's Multi-Sector General Permit (MSGP) website at <http://www.dec.ny.gov/chemical/9009.html>.

Sincerely,

Justine Modigliani, P.E., Chief  
Compliance Section, Water Compliance Branch

Enclosure

cc: Joseph DiMura, P.E., Director, Bureau of Water Compliance Programs, NYSDEC,  
w/enclosure  
Timothy DiGiulio, P.E., Regional Water Engineer, NYSDEC Region 7, w/enclosure  
(electronic)  
Dale Vollmer, P.E., Environmental Engineering Manager, Plumley Engineering. P.C.,  
w/enclosure

# Water Compliance Inspection Report

## Section A: National Data System Coding (i.e., PCS)

Transaction Code		NPDES										yr/mo/day					Inspection Type		Inspector		Fac Type					
1	5	3	N	Y	R	0	0	D	0	2	2	11	12	1	5	0	8	0	4	17	18	C	19	B	20	2
Remarks																										
21																										
66																										
Inspection Work Days				Facility Self-Monitoring Evaluation Rating										BI		QA		Reserved								
67	4			69	70		71		72		73		74		75		76		77		78		79		80	

## Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number)  Weitsman Shredding, LLC 1 Recycle Drive Owego, NY 13827	Entry Time/Date 1:00 PM/8-4-15	Permit Effective Date 1-27-13
	Exit Time/Date 6:00 PM/8-4-15	Permit Expiration Date 9-30-17
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)  Adam Weitsman, Owner P.O. Box 420 Owego, NY 13827	Other Facility Data (e.g., SIC NAICS, and other descriptive information)  SIC Code 5093 (Scrap and Waste Materials)	
Name, Address of Responsible Official/Title/Phone and Fax Number  Adam Weitsman, Owner Office: (607) 687-7777 Cell: (607) 760-8204 Fax: (607) 687-7746	Contacted <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	



## Section C: Areas Evaluated During Inspection (Check only those areas evaluated)

Inspected		Evaluated During Inspection		Check only those areas evaluated	
<input checked="" type="checkbox"/>	Permit	<input type="checkbox"/>	Self-Monitoring Program	<input type="checkbox"/>	Pretreatment
<input checked="" type="checkbox"/>	<b>Records/Reports</b>	<input type="checkbox"/>	Compliance Schedules	<input type="checkbox"/>	Pollution Prevention
<input checked="" type="checkbox"/>	Facility Site Review	<input type="checkbox"/>	Laboratory	<input checked="" type="checkbox"/>	Storm Water
<input type="checkbox"/>	Effluent/Receiving Waters	<input type="checkbox"/>	Operations & Maintenance	<input type="checkbox"/>	Combined Sewer Overflow
<input type="checkbox"/>	Flow Measurement	<input type="checkbox"/>	Sludge Handling/Disposal	<input type="checkbox"/>	Sanitary Sewer Overflow

## Section D: Summary of Findings/Comments

*(Attach additional sheets of narrative and checklists, including Single Event Violation codes, as necessary)*

SEV Codes	SEV Description
<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	See attached CEI report.
<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	
A0N22	Narrative Effluent Violation
B N 1 9 A	Failure to properly install/implement BMPs

Name(s) and Signature(s) of Inspector(s) 	Agency/Office/Phone and Fax Numbers	Date 12-3-15
Katherine Mann, Physical Scientist	EPA Region 2/DECA-WCB/212-637-4226	
Signature of Management Q A Reviewer  Justine Modigliani, P.E., Chief, Compliance Section	Agency/Office/Phone and Fax Numbers EPA Region 2/DECA-WCB/212-637-4268	Date 12-4/15





**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**REGION 2, DECA-WCB**  
**20<sup>th</sup> Floor, 290 Broadway, NY, NY 10007**

**COMPLIANCE EVALUATION INSPECTION REPORT**

<b>Compliance Evaluation Inspection:</b> Weitsman Shredding, LLC d/b/a Upstate Shredding, LLC
<b>Inspection Date:</b> August 4, 2015 <b>Inspection Time:</b> 1:00 PM – 6:00 PM
<b>EPA Inspector:</b> Katherine Mann, Physical Scientist, USEPA Region 2, DECA, Water Compliance Branch (212) 637-4226
<b>On-Site Representative:</b> Adam Weitsman, Owner, Office: (607) 687-7777, Cell: (607) 760-8204
<b>Site Information:</b> 1 Recycle Drive, Owego, NY 13827; SPDES No. NYR00D022
<b>Owner/Operator/Permittee:</b> Weitsman Shredding, LLC  Adam Weitsman, Owner, P.O. Box 420, Owego, NY 13827
<b>SIC Code:</b> 5093 (Scrap and Waste Materials)

**INTRODUCTION:**

On August 4, 2015, the United States Environmental Protection Agency (“EPA”) conducted a Compliance Evaluation Inspection (“CEI”) at the Weitsman Shredding, LLC facility located at or near 1 Recycle Drive in Owego, New York (the “Site” or the “Facility”). The Facility is a ~22-acre scrap metal shredding and recycling facility operating under SIC code 5093. Upon arrival, the EPA inspector presented credentials to Mr. Adam Weitsman, Owner. Mr. Weitsman accompanied the EPA inspector on a walk-through of the Facility. Weather conditions at the time of the inspection were dry, partly cloudy and approximately 78°F. Stormwater runoff discharges from two (2) outfalls at the Site and drains to Owego Creek.

The Facility has coverage for its stormwater discharges under the New York State Department of Environmental Conservation (“NYSDEC”) State Pollutant Discharge Elimination System (“SPDES”) Multi-Sector General Permit for Stormwater Discharges associated with Industrial Activity (“MSGP” or “Permit”), as defined by the present general permit number, GP-0-12-001. GP-0-12-001 became effective October 1, 2012 and will expire on September 30, 2017. The Facility also had coverage under previous versions of the MSGP, including GP-0-11-009, which expired on September 30, 2012, and GP-0-06-002, which became effective on March 28, 2007 and expired on September 30, 2012. According to data from the NYSDEC, the Facility submitted a Notice of Intent (“NOI”) in December 2012 to continue MSGP coverage under GP-0-12-001. The NYSDEC received the NOI on December 28, 2012, and coverage under GP-0-12-001 subsequently went into effect thirty (30) days later on January 27, 2013 (SPDES ID No. NYR00D022). A Notice of Modification (“NOM”) was submitted by the Facility to add Outfall 002 on or around July 23, 2014, and was received by the NYSDEC on July 28, 2014. An additional NOM was submitted by the Facility on or around January 19, 2015 to change the industrial sector for Outfall 002 from N-4 to N-3. The NOM was received by the NYSDEC on

January 22, 2015. Based on information available to EPA, it is not clear whether the Facility received an Acknowledgement Letter from the NYSDEC confirming the industrial sector associated with Outfall 002.

### **FINDINGS & OBSERVATIONS:**

During the CEI, EPA reviewed the Stormwater Pollution Prevention Plan ("SWPPP") updated in March 2014, as well as monthly inspection logs, quarterly visual monitoring records, annual dry weather monitoring records, annual comprehensive site inspections, benchmark/numeric effluent monitoring records, and corrective action monitoring records available at the time of the CEI. Subsequent to the CEI, Mr. Dale Vollmer of Plumley Engineering provided 2013 benchmark sampling results, an updated site map revised on August 10, 2015, and employee training records, which were missing from the records onsite.

In addition to Outfalls 001 and 002, stormwater can also leave the Site along with process wastewater through an onsite wastewater treatment facility, which discharges to the Town of Owego sanitary sewer. Facility representatives stated that discharges to the Town of Owego sanitary sewer are regulated under a pretreatment permit. Stormwater and process wastewater are pumped to the treatment facility from a sump located in the shredder area. According to Facility representatives, the treatment facility is not often used, as most of the collected water is reused in the shredding process.

Based on review of benchmark monitoring records, the Facility was above the cutoff concentrations for several parameters, including total suspended solids ("TSS"), aluminum, copper, iron, lead and zinc, at Outfall 002 during 2014 benchmark sampling (conducted on October 15, 2014). The Facility also exceeded its numeric effluent limitation for Total Mercury (50 ng/L) at Outfall 002 during this sampling event. Corrective actions identified by the Facility following the exceedances included installation of an inverted culvert pipe upstream of Outfall 002. At the time of the August 4, 2015 CEI, the Facility had not yet completed the identified corrective action. On September 21, 2015, Mr. Weitsman provided photo documentation of installation of the inverted culvert pipe. Mr. Weitsman also indicated that the soil disturbance resulting from the installation of the pipe would be seeded that week.

The corrective action sample collected on June 23, 2015 was below the cutoff concentrations for the abovementioned benchmark monitoring and numeric effluent limitation parameters, with the exception of aluminum, copper and iron. At the time of the June 2015 sampling, corrective actions identified by the Facility to reduce the pollutants leaving the Site via Outfall 002 included installing erosion control measures in the swale leading to the outfall. No long term corrective actions were identified by the Facility.

The Facility also exceeded its Total Mercury numeric effluent limit at Outfall 001 during 2013 sampling (conducted on November 7, 2013). Based on the Corrective Action form, the exceedance was attributed to stormwater coming in contact with scrap piles. Corrective actions identified by the Facility included keeping scrap piles under cover to minimize contact with stormwater, and keeping piles within the stone "perimeter" swale (located around the southwest corner of the pavement, east of the stormwater pond). The corrective action sample collected on

August 12, 2014 was below the numeric effluent limit for Total Mercury. During the CEI, the abovementioned stone perimeter swale was not in place. Facility representatives indicated that the swale was not effective at the Facility due to vehicular traffic and had been paved over. In the revised August 10, 2015 site map submitted by Mr. Vollmer, the swale had been removed from the Site plan.

In 2012, the Facility experienced benchmark monitoring results above the cutoff concentrations for iron and COD. In addition, in 2011, the Facility was slightly over the cutoff concentration for COD. Prior to the current MSGP (GP-0-12-001), corrective action sampling was not a Permit requirement; therefore, corrective action sampling results are not available for the 2011 and 2012 exceedances. The 2012 annual report identified removing sediment from the forebay of the stormwater retention pond as a corrective action to address the iron and COD exceedances. No corrective actions were identified in the 2011 annual report.

Based on the records review and the Facility walk-through conducted at the time of the CEI, EPA identified the following potential noncompliance items and areas of concern at the Facility, described below. Most of these items were corrected shortly after the CEI, and some were addressed prior to the close of the CEI. Photos documenting corrective actions were submitted by Mr. Weitsman on 8/7/2015, 8/10/2015, 8/17/2015, 8/18/2015 and 9/21/2015.

#### **Potential Noncompliance Items**

1. In accordance with Part IV.B.1.c.(6).(b) of the MSGP, sources of contamination that are identified as causing exceedances of benchmark cutoff concentrations must be addressed by implementation of non-structural and/or structural Best Management Practices ("BMPs") to prevent recurrence. Furthermore, Part IV.B.1.c.(6).(d).(iii) of the Permit states the following: *If corrective actions at a facility do not result in achieving benchmark cut-off concentrations, the facility must continue efforts to implement additional BMPs. Failure to undertake and document the review and/or take the necessary corrective actions are violations of the permit. Continued exceedance of benchmark monitoring cut-off concentrations may identify facilities that would be more appropriate covered under an individual SPDES permit.*

As previously stated, the Facility has experienced recurring exceedances of the benchmark cut-off concentrations. In particular, the Facility exceeded the cut-off concentrations for aluminum, copper and iron in October 2014 and again during corrective action sampling in June 2015. The benchmark sample was also above the cut-off concentration for iron in 2012. The Facility is required to reevaluate sources of contamination and implement additional BMPs to ensure stormwater discharges from the Site are under the benchmark limits, in accordance with Parts IV.B.1.c.(6).(b) and IV.B.1.c.(6).(d).(iii) of the MSGP. The SWPPP must also be updated to reflect additional BMPs implemented at the Facility, in accordance with Parts IV.B.1.c.(6).(c) and III.E of the MSGP.

2. As previously stated, the Facility exceeded its numeric effluent limitation for Total Mercury at Outfall 001 in 2013 and Outfall 002 in 2014. In accordance with Part IV.B.1.e.(5) of the MSGP, the exceedance of a numeric effluent limitation constitutes a permit violation. The

Facility must perform and document corrective actions to remedy the problem in accordance with Parts IV.B.1.e.(5).(a)-(e) of the MSGP.

3. Corrective action monitoring was not conducted within the first six (6) months of the calendar year following exceedances of benchmark cutoff concentrations experienced in November 2013. This was acknowledged and explained by the Facility in a letter sent with a Non Compliance Event Form to the NYSDEC dated July 28, 2014. The Facility must ensure corrective active sampling is performed in a timely manner, in accordance with Part IV.B.1.c.(6).(d) of the MSGP.
4. As identified in photographs P8040039 and P8040040, there was significant erosion and a pavement collapse at the inflow point to the pond at the Site, resulting in sediment loading to the pond, which drains to Outfall 001. On August 7, 2015, Mr. Weitsman sent a photograph of the pond inlet, with the sediment removed and fresh rip rap installed. An additional photo of the pond inlet was provided on August 18, 2015. The Facility must ensure onsite erosion and sedimentation is minimized, in accordance with Part I.B.1.a.(2).(e) of the MSGP.
5. As identified in photographs P8040039 and P8040041, an uncovered dumpster used for storing "heavies" (large steel) was located immediately adjacent to the pond draining to Outfall 001. In an email dated August 7, 2015, Mr. Weitsman indicated that the dumpster had been moved. A photograph this location without the dumpster was provided by Mr. Weitsman on August 10, 2015. The Facility must ensure BMPs are in place to minimize transport of pollutants, such as iron, to the stormwater pond and Outfall 001. Furthermore, dumpsters must be covered where practicable, in accordance with the SWPPP and Parts III.A and VIII (Sector N) of the MSGP.
6. As identified in photographs P8040043, the turnings pile in the southeast corner of the Site was not covered at the time of the CEI. In an email dated August 7, 2015, Mr. Weitsman indicated that the turnings pile had been covered. This was confirmed with photo documentation on August 10, 2015. The Facility must ensure all turnings are stored in covered bins or in bermed areas and covered with tarps, in accordance with the SWPPP and Parts III.A and VIII (Sector N) of the MSGP.
7. As identified in photograph P8040065, an oil spill was identified on the ground towards the west side of the Facility, north of the pond. Absorbent material was applied to the spill before the close of the CEI (see photograph P8040138). Please ensure spills and leaks are promptly cleaned up, in accordance with the SWPPP and Parts III.A and I.B.1.a.(2).(a) of the MSGP.
8. As identified in photographs P8040136 and P8040137, a leaking piece of heavy equipment was observed on the west side of the Site at the time of the CEI. In an email dated August 7, 2015, Mr. Weitsman indicated that this area had been cleaned up and the equipment moved. A photograph showing the cleaned area was provided by Mr. Weitsman on August 10, 2015. The Facility must perform equipment maintenance inside, whenever possible, utilize drip pans for leaky equipment, and promptly clean up any releases, in accordance with the SWPPP and Parts III.A, VIII (Sector N) and I.B.1.a.(2).(a) of the MSGP.



9. As identified in photograph P8040129, several 55-gallon drums with various contents were stored outside the new maintenance garage where they were exposed to stormwater. Some of the drums were placed in a secondary containment structure, whereas others were stored without secondary containment. On August 17 and 18, 2015, Mr. Weitsman provided photo documentation of the drums, which had all been placed in a secondary containment structure and covered with a tarp. The Facility must ensure drums containing liquids are stored indoors whenever practicable (or covered so that they are not exposed to stormwater) and are stored with containment devices such as spill pallets, in accordance with the SWPPP and Parts III.A and VIII (Sector N) of the MSGP.
10. As identified in photographs P8040057, three (3) 55-gallon drums of antifreeze were identified on the south side of the Site at the time of the CEI in an area exposed to stormwater. The drums were moved under the adjacent roofed structure prior to the close of the CEI (see photograph P8040139). The Facility must ensure drums containing liquids are stored indoors whenever practicable and are stored with containment devices such as spill pallets, in accordance with the SWPPP and Parts III.A and VIII (Sector N) of the MSGP.
11. As identified in photograph P8040142 – P8040144, good housekeeping issues were observed inside the old maintenance garage, including storage of drums without secondary containment, staining to the garage floor, and pooled antifreeze on top of a 55-gallon drum. In an email dated August 7, 2015, Mr. Weitsman indicated that the old maintenance garage had been cleaned and organized. A photograph was provided on August 17, 2015 documenting that the drums had been placed on spill pallets and the garage floor had been cleaned. The Facility must ensure drums containing liquids are stored with containment devices such as spill pallets, in accordance with the SWPPP and Parts III.A and VIII (Sector N) of the MSGP.
12. As identified in photograph P8040146, two (2) 55-gallon drums were observed outdoors, (although mostly under a roofed area), next to the old maintenance garage. Drums containing liquids must be stored indoors whenever practicable and with containment devices such as spill pallets, in accordance with the SWPPP and Parts III.A and VIII (Sector N) of the MSGP.

#### Areas of Concern

13. As identified in photograph P8040130, tires were stored outdoors on the northwest side of the Facility at the time of the CEI. Tires should be stored in areas where they are not exposed to stormwater to prevent the transport of associated pollutants to surface and ground waters. In an email dated August 17, 2015, Mr. Weitsman provided photo documentation of a metal shed being utilized for tire storage at the Site.
14. As identified in photographs P8040133 and P8040134, paint cans and miscellaneous metal parts were stored outdoors next to the drainage ditch leading to Outfall 002 at the time of the CEI. These items should be stored indoors to prevent the transport of associated pollutants to surface and ground waters. In an email dated August 7, 2015, Mr. Weitsman indicated that the paint cans had been discarded.



15. As identified in photograph P8040037, scrap storage in the center of the Site (west of the shredder) is exposed to stormwater and is a potential source of pollutants to the on-site stormwater treatment pond. In addition, aluminum and steel piles on the south side of the shredding area are located in an exposed area where stormwater flows to the pond (see photographs P8040042 and P8040051). Due to the removal of the stone perimeter swale, there are currently no structural BMPs (e.g., containment or diversion structures) in place to minimize the transport of pollutants from these sources to the pond, which discharges to Outfall 001.
16. As identified in photographs P8040059 – P8040061 and P8040064, sediment build-up and some discoloration were observed at the weir at Outfall 001. As identified in P8040064, a sheen was observed in the sediment at the weir.

A closing conference was held with Mr. Weitsman at the end of the CEI.

Within **forty-five (45) calendar days** of receipt of this letter, please respond to the EPA in writing with the actions that the Facility has taken or will take to address the Potential Noncompliance Items and Areas of Concern identified in items 1-16 this report. Several of these items were already remedied by you during or shortly after the CEI. For such items, please confirm that the practices implemented continue to be effective and/or provide any relevant updates, as appropriate.

**ATTACHMENTS:**

Photograph Log  
Photographs

## **PHOTOGRAPH LOG:**

Photo Log – Weitsman Shredding, LLC d/b/a Upstate Shredding, LLC – August 4, 2015 Unedited Photographs Taken by Katherine Mann with Olympus TG-830 Digital Camera	
P8040037	Scrap materials stored under cover and in exposed areas near the center of the Site. According to Mr. Weitsman, the Facility shreds “to the ground” each day. The Site is paved with blacktop and/or concrete.
P8040038	Metal scrap to be shredded
P8040039	Pavement collapse at pond inlet, and red heavy steel dumpster located immediately adjacent to the inlet
P8040040	Erosion at pond inlet and sediment build-up in pond
P8040041	Heavy steel dumpster located immediately adjacent to the pond
P8040042	Aluminum and steel piles exposed to stormwater near shredding operations
P8040043	Uncovered turnings pile
P8040044	Burned scrap metal pile
P8040045	Cranes loading ferrous metal into rail cars on east side of the Site
P8040046	Bays for processed shredder fluff on east side of the Site
P8040047	Bays for processed shredder fluff on east side of the Site
P8040048	Pile of shredded material for non-ferrous metal removal
P8040049	Automotive shredder residue (ASR) is transported to local landfills
P8040050	Pile of ferrous metal to be loaded into rail cars
P8040051	Aluminum and steel piles on the south side of the Site. Runoff from these piles flows towards the stormwater pond and Outfall 001.
P8040052	Covers to sump in shredder area where wastewater and stormwater is collected
P8040053	Wastewater in sump (can be pumped to wastewater treatment facility on north side of the Site)
P8040054	Close-up of wastewater in sump
P8040055	Work station near shredding area; miscellaneous paint can
P8040056	Manganese hammers stored on the ground on the south side of the Site
P8040057	Three (3) 55-gallon drums of antifreeze located outdoors on the south side of the Site
P8040058	Vegetative buffer in outlet to the stormwater pond
P8040059	Weir at Outfall 001 (with sediment build-up on pond side of the weir)
P8040060	Discoloration at low flow discharge point from the weir
P8040061	Close-up of discoloration at low flow discharge point from the weir
P8040062	Rip rap downstream of Outfall 001 (Owego Creek is located beyond the fence line)
P8040063	Sediment build-up on pond side of the weir
P8040064	Close-up of sediment with sheen on the pond side of the weir (at Outfall 001)
P8040065	Spill observed on the ground just north of the stormwater pond
P8040129	55-gallon drums containing various liquids stored outdoors on the northwest side of the Site. Some of the drums were situated in a secondary containment structure, and others were stored without secondary containment.

P8040130	Tires stored outdoors on the west side of the new maintenance garage (northwest side of the Site)
P8040131	55-gallon drums of coolant, tires, and other materials stored on wooden pallets on the north side of the new maintenance garage
P8040132	Culvert in the ditch that drains west to Outfall 002. Some sediment accumulation was observed in the ditch at the time of the CEI.
P8040133	Miscellaneous paint cans and metal parts stored outdoors just north of the drainage ditch near the new maintenance garage
P8040134	Empty paint cans in trash receptacle stored outdoors just north of the drainage ditch near the new maintenance garage
P8040135	Downstream end of culvert pipe identified in P8040132, with vegetated drainage path to Outfall 002
P8040136	Leaking heavy equipment stored outdoors, without drip pan, on the west side of the Site
P8040137	Leaking heavy equipment stored outdoors, without drip pan, on the west side of the Site; additional staining to the pavement in the foreground
P8040138	Prior to the close of the CEI, speedy-dry was applied to the spill identified in photograph P8040064.
P8040139	Prior to the close of the CEI, the antifreeze drums identified in photograph P8040057 were relocated under an awning.
P8040140	South side of the Site (facing east)
P8040141	Employees covering aluminum and steel piles near the shredder with tarps (the employees had mistaken these piles for the turnings pile, which Mr. Weitsman had requested be covered during the CEI)
P8040142	240-gallon hydraulic oil tank, and housekeeping issues inside old maintenance garage (drums stored without secondary containment, staining observed on garage floor)
P8040143	Additional drums stored in the old maintenance garage without secondary containment
P8040144	Close-up of pooled antifreeze on top of a 55-gallon drum in the old maintenance garage
P8040145	500-gallon used oil tank stored outside the old maintenance garage under a roof; 55-gallon drum on the left was stored without secondary containment
P8040146	Two (2) 55-gallon drums stored outside the old maintenance garage without secondary containment



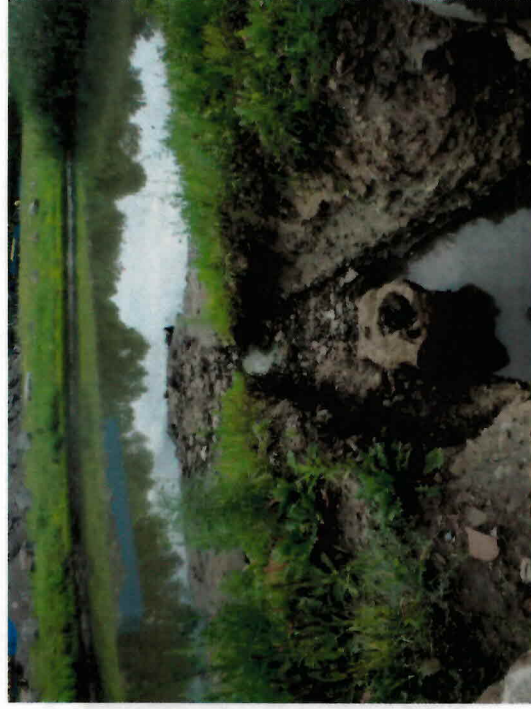
P8040037



P8040038



P8040039



P8040040

Weitsman Shredding, LLC (NYR00D022) Compliance Evaluation  
Inspection - August 4, 2015





P8040041



P8040042



P8040043



P8040044





P8040045



P8040046



P8040047



P8040048

Weitsman Shredding, LLC (NYR00D022) Compliance Evaluation  
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P8040049



P8040050



P8040051



P8040052

Weitsman Shredding, LLC (NYR00D022) Compliance Evaluation  
Inspection - August 4, 2015





P8040053



P8040054



P8040055



P8040056

Weitsman Shredding, LLC (NYR00D022) Compliance Evaluation  
Inspection - August 4, 2015



P8040057



P8040058



P8040059

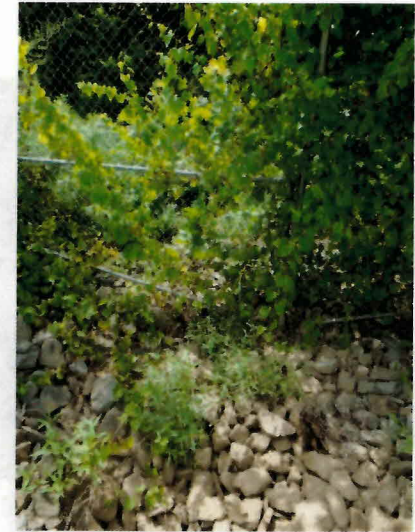


P8040060





P8040061



P8040062



P8040063

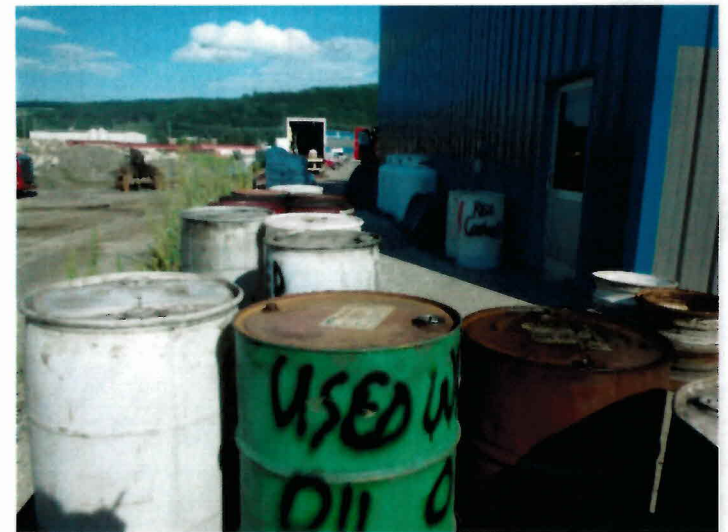


P8040064





P8040065



P8040129



P8040130



P8040131

Weitsman Shredding, LLC (NYR00D022) Compliance Evaluation  
Inspection - August 4, 2015



P8040132



P8040133



P8040134



P8040135





P8040136



P8040137



P8040138



P8040139



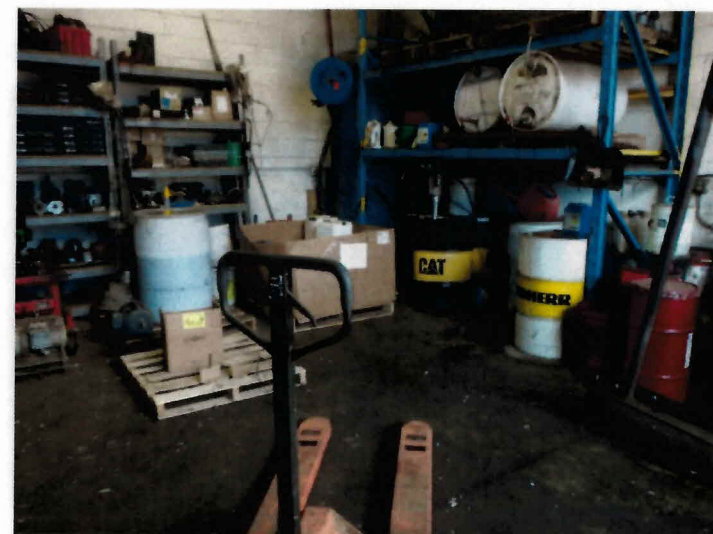
P8040140



P8040141



P8040142



P8040143





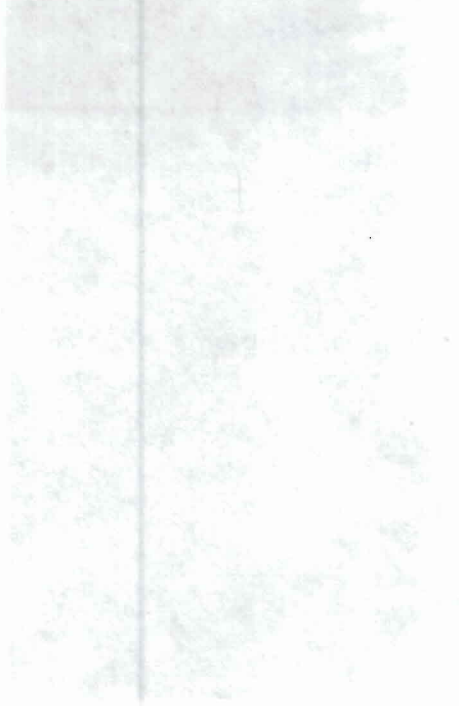
P8040144



P8040145



P8040146



Weitsman Shredding, LLC (NYR00D022) Compliance Evaluation  
Inspection - August 4, 2015